

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: APPLICATION OF )  
FORBES MEDIA LLC ) MISC. NO. 21-52  
AND THOMAS BREWSTER )  
TO UNSEAL RECORDS )

**GOVERNMENT'S RESPONSE IN OPPOSITION**  
**TO APPLICANTS' MOTION TO UNSEAL GOVERNMENT'S RESPONSE**

The United States of America, by its attorneys, Stephen R. Kaufman, Acting United States Attorney for the Western District of Pennsylvania, and Shardul S. Desai, Assistant United States Attorney for said District, respectfully submits this response in opposition to the Applicants' Motion to Unseal Government's Response In Opposition to Application to Unseal. The Government avers as follows:

1. On January 25, 2021, Forbes Media LLC and Thomas Brewster (hereinafter "Applicants") filed an Application to Unseal Court Records. *See* ECF No. 1. On February 16, 2021, The Government sought leave to file its Response in Opposition under seal. On February 16, 2021, the Government filed its redacted Response in Opposition. *See* ECF No. 12. Subsequently, the Government filed, *ex parte* and under seal, its unredacted Response in Opposition. *See* ECF No. 16.

2. On February 23, 2021, the Applicants filed a Motion to Unseal Government's Response in Opposition to Application to Unseal. *See* ECF No. 20. Applicants are seeking that the redacted portions of the Government's Response be unsealed. Applicants recognized that their motion is based on "the same substantive reasons and on the same grounds as set forth in their Memorandum of Points and Authorities in Support of Application to Unseal Court Records (ECF No. 2) and in their concurrently filed Reply in support of that Application (ECF No. 19)."

3. The Government opposes the Applicants' Motion (ECF No. 20) for the same substantive reasons and on the same grounds as set forth in the Government's Response (ECF Nos. 12 and 16). In lieu of reiterating those arguments, the Government incorporates its Response herein. The Government respectfully requests that the Court deny Applicants' Motion.

Respectfully submitted,

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